

To the FCC Commissioners:

I am pleased to offer the following comments concerning the Commission's proposed Part 97 Rules change that would eliminate a proficiency in Morse code telegraphy as an examination requirement for issuing all amateur radio licenses. The FCC's proposal represents the culmination of a long-term effort to diminish the value of, and ultimately eliminate the need for, proficiency in Morse code by amateur radio operators.

Referencing the action taken at the 2003 World Radiocommunication Conference (WRC-03), the Commission contends that “. . . the public interest would be served best by reducing the telegraphy examination requirement for an amateur radio operator license to the minimum standard that would satisfy the *Radio Regulations*, namely, the requirement that a control operator of a station prove that he or she can ensure the proper operation of that station.” However, I do not believe the *Radio Regulations* as revised by WRC-03 require that no telegraphy examination requirement should be imposed. It merely leaves that decision up to each country's licensing authority to determine. Furthermore, if telegraphy remains a communications mode authorized for amateur use, but licensees are not required to demonstrate a proficiency in that mode, how can a licensed amateur as a control operator fulfill his/her requirement to ensure that an amateur station transmitting Morse code telegraphy is being properly operated? There should be some minimum telegraphy requirement, if for no other reason than to fulfill the control operator responsibilities.

In addition, the Commission justifies its proposal by saying it believes that, if adopted, the elimination of Morse code proficiency as an examination element would . . .

- (1) Encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators;
- (2) Eliminate a requirement the Commission now considers to be unnecessary and that may discourage amateur service licensees from advancing their skills in the communications and technical phases of amateur radio; and
- (3) Promote more efficient use of the radio spectrum currently allocated to the amateur radio service.

I would argue these presumed expectations are of questionable validity, and are insufficient to justify adoption of the proposal.

First, as it pertains to individuals interested in becoming amateur radio operators, how can anyone say that Morse code telegraphy is not a widely used form of “communications technology”? Not only that, I would further argue that Morse code telegraphy is indeed perhaps the purest form of “the radio art.” Granted, other more advanced forms of technology have their place in the inventory of communications tools. However, this does not mean that Morse code is no longer relevant to communications or needs to be totally eliminated. In my view, expanding the “radio art” by adding newer technology does not necessarily demand the complete elimination of other older communications modes. Each form of communications has its own value. I cannot believe that requiring a basic proficiency in Morse code telegraphy could possibly be significant deterrent to prospective amateur radio operators. To take that position presumes a widespread inability of individuals to learn Morse code, which I do not believe to be the case. At worst, some might consider it an ability they simply do not want to take the time to develop. Most importantly, since there is currently no telegraphy examination requirement for the Technician Class or General Class licenses, how could eliminating the existing five word-per-minute requirement for Amateur Extra Class alone be considered a barrier to entry for individuals wishing to become amateur radio operators? This makes no sense at all.

Second, I would argue that simply saying Morse code proficiency is now an “unnecessary” licensing requirement is taking the Commission’s previous changes to licensing requirements to an unwarranted extreme. The “incentive” licensing program instituted by the Commission many years ago prompted large numbers of General Class amateurs to upgrade their licenses to the Amateur Extra Class in order to preserve the full extent of their operating privileges. This included passing a 20 word-per-minute Morse code proficiency test. The fact that so many operators did this is testament to the fact that it could be done. Since then, the code proficiency requirement has since been reduced by the Commission to a mere 5 words-per-minute, hardly a daunting task for anyone truly interested in becoming an amateur or in advancing their skills. In my opinion, Morse code telegraphy is probably one of the only true operator “skills” exercised by amateur radio licensees today. Speaking into a microphone or pressing keys on a keyboard are not operator skills comparable to the ability to send and receive Morse code. Eliminating the Morse code requirement altogether does not seem to represent an advancement of operator communications skills. Rather, it would eliminate a currently recognized skill.

Third, a total elimination of Morse code proficiency would reduce the amateur radio licensing requirements to only written examination elements. Since all the questions and all the answers for all examination elements are publicly

available, passing an amateur license examination in the future would simply require the ability to memorize a body of material, without being required to demonstrate any operating ability whatsoever.

Fourth, with respect to the efficient use of the frequency spectrum, I believe that Morse code telegraphy consumes a very small incremental frequency bandwidth, much less than single sideband or other voice modes. To say that eliminating Morse code telegraphy would produce a “more efficient” use of the frequency spectrum allocated to amateur radio service does not seem to be a valid argument.

Fifth, Morse code telegraphy represents a uniquely simplistic form of communications. It requires only the barest minimum of equipment, can be reliably used at low power levels and under very marginal conditions, and could be critically important under certain emergency situations. It is also interesting to note that several CW transceiver “kits” are available on the market which are easy to build and provide hands-on experience with electronic components and circuits. Doesn’t this provide a cost-effective way both to expand an awareness of technology and to develop and telegraphy operating skills?

In the aggregate, the above observations would clearly seem to argue in favor of retaining the existing licensing requirements.

Admittedly, the currently diminished Morse code proficiency requirement already reflects the lesser relevance of telegraphy when compared with newer forms of high speed data communications. Nevertheless, I don’t think it warrants total elimination as a licensing requirement. If it were eliminated, it would not remove a disincentive for those aspiring to become amateur radio operators, since the current requirement applies only to the Amateur Extra Class license. Although there is no requirement for an amateur radio licensee to use telegraphy after passing the examination, nor is there a requirement to use any other authorized mode. Eliminating all telegraphy requirements would mean that no amateur radio licensee, regardless of license class, had to demonstrate any operating ability whatsoever. The result would clearly dilute the aggregate skill level of the entire pool of amateur radio licensees.

For the sake of preserving a fundamentally effective form of communications that still has widespread application within the amateur community, and reflects a true “operating skill,” I strongly urge you not to adopt your proposal. It would better serve the public interest if the Commission retains the current five words-per-minute examination requirement applicable to Amateur Extra Class licenses. I personally passed the five wpm examination

when I obtained my Novice class license in 1955 – at the age of 14! Many other young Novices did the same. Taking the position that the same minimum requirement can no longer be met by even the highest class of amateur radio licensees implies that they do not possess the ability to reach this threshold, something that is certainly not supported by the facts.

Among the several pending issues relevant to amateur radio licensing, the public interest would seem better served if the Commission spent its time and resources in dealing with issues far more significant than the total elimination of the telegraphy examination requirement for only one class of amateur license. There is no compelling urgency whatsoever all to eliminate the Amateur Extra Class telegraphy examination requirement at this time, especially considering the Commission's stated rationale for doing so. The proposal seems to be nothing more than an administrative action on a matter that can be reconsidered at some later date if, or when, it becomes operationally necessary.

Respectfully,

Myron W. Manker  
W4UR